



## I. NOTICE OF CLASS MEMBERSHIP AND COMPLIANCE

Petitioner informs the Court that, in accordance with *Calderón Jiménez v. Mayorkas, et al.*, D. Mass. No. 1:18-cv-10225-MLW (effective January 16, 2025 through January 16, 2027), he has provided notice of his wife's class membership to the following parties:

- Office of the Chief Immigration Judge / EOIR, Judge Meredith B. Tyrakoski, Pearsall, TX
- Warden Lopher Jenkins, Karnes County Immigration Processing Center
- Director Patricia Hyde, ICE ERO Boston Field Office
- Director Wiley Blakeway, ICE ERO San Antonio Field Office
- Class Counsel: ACLU of Massachusetts / WilmerHale LLP
- Kathleen M. Gillespie, Esq.

This notice confirms that Jordania Rafaela Bolduc (née De Campos), A# [REDACTED] DOB: [REDACTED] is a member of the Calderón Jiménez Settlement Class, and that Petitioner has complied with the settlement obligations. This notification is provided to ensure the Court is fully informed of compliance with applicable class-action procedures.

## II. BACKGROUND AND PRIOR COURT ORDERS

On October 24, 2025, this Court ordered that Jordania personally sign the § 2241 Petition and return it within 30 days. She is unable to comply because:

- She does not speak, read, or write English;
- She has been given no interpreter;
- She has no case manager;
- She cannot comprehend the petition or the Court's instructions;
- Detention staff have not provided assistance to access or review the documents.

Petitioner speaks English but his wife does not, making counsel essential for compliance.

## III. UNSUCCESSFUL ATTEMPTS TO RETAIN COUNSEL

1. Dozens of attorney contacts in South Texas:
  - 25–30 telephone calls to attorneys in the San Antonio region;
  - Three paid consultations (two video, one telephone) totaling approximately \$800;
2. \$15,000 paid to Attorney José Vazquez, Mashpee, Massachusetts:
  - Retained to handle all aspects of Jordania's immigration and detention matters;
  - Attorney Vazquez failed to file documents, communicate meaningfully, or act on the case;
3. Financial ability is not the barrier:
  - Petitioner and his wife are willing and able to pay counsel;
  - No attorney has accepted representation due to case complexity, not payment.

#### **IV. LEGAL BASIS FOR APPOINTING COUNSEL**

- Constitutional due process rights:

All persons physically present in the U.S., including immigration detainees, are entitled to Fifth and Fourteenth Amendment due process protections. These rights are compromised if the detainee cannot understand filings, access an interpreter, or meaningfully participate.

- Statutory authority:

Appointment of counsel is authorized under 18 U.S.C. § 3006A(a)(2)(B) and Rules Governing § 2241 Petitions where “the interests of justice so require.”

- Compelling circumstances here:

- Detention and language barriers;
- Imminent deadlines and complex federal habeas and immigration issues;
- Inability to comply with Court orders without counsel.

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#### **V. TIME-SENSITIVE REQUEST**

Jordania has a hearing before Judge Meredith B. Tyrakoski at the Pearsall EOIR Court on November 21, 2024.

Petitioner respectfully requests the Court recognize the urgent, time-sensitive nature of this matter, and appoint counsel immediately to allow:

1. Assistance with filings and Court compliance;
2. Preparation for the EOIR hearing;
3. Coordination with Judge Tyrakoski or EOIR staff as necessary.

#### **VI. REQUEST FOR RELIEF**

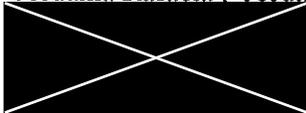
Petitioner respectfully requests that the Court:

1. Appoint qualified counsel for Jordania Rafaela (“Jordan”) Bolduc;
2. Permit counsel to meet with her at Karnes County Immigration Processing Center and assist with filings and Court compliance;
3. Recognize the time-sensitive nature of her November 21, 2024 EOIR hearing;
4. Notify or coordinate with EOIR Judge Tyrakoski as appropriate;
5. Grant any further relief deemed just and proper.

**Respectfully submitted,**



Joshua T. Bolduc  
Petitioner on behalf of  
Jordania Rafaela ("Jordan") Bolduc



Email: [Jtb14@hotmail.com](mailto:Jtb14@hotmail.com)  
November 18, 2025